

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No. 03-882-MBB
	)	
ROMAN VALDMA,	)	
Defendant.	)	
_____	)	

**ASSENTED TO MOTION TO MODIFY CONDITIONS OF RELEASE**

The Defendant, Roman Valdma ("Valdma"), requests modification of his condition of release and allow him to travel outside the Commonwealth of Massachusetts from October 16, 2003 to October 20, 2003. As grounds therefor, Valdma states the following:

1. On August 5, 2003, Valdma was arrested under a warrant issued upon Complaint. The Complaint alleged that Valdma committed visa fraud in violation of 18 U.S.C. § 1546(a). The time for Indictment in this matter has been extended until October 29, 2003.

2. On August 8, 2003, the Court issued an Order Setting Conditions of Release (the "Order"). The Order included a condition restricting Valdma's travel to the Commonwealth of Massachusetts.

3. By this motion, Valdma requests modification of the Order so that he may travel to Daytona, Florida for vacation from October 16, 2003 until October 20, 2003.

4. Under the circumstances of this case, there is no significant risk of flight. Valdma was released on a \$250,000 appearance bond secured by a \$50,000 mortgage on his home, located at 2 La Rose Place, Unit 25, Boston, Massachusetts.

5. Counsel for the government, Ms. West and Ms. Schulman, assent to the allowance of this motion.

WHEREFORE, Valdma respectfully requests the Court allow his motion.

ROMAN VALDMA  
By his attorneys



Thomas J. Butters  
B.B.O. No. 068260  
Matthew D. Thompson  
B.B.O. No. 655225  
Butters Brazilian LLP  
One Exeter Plaza  
Boston, Massachusetts 02116  
617-367-2600

Dated: October 3, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that the above-referenced document was served upon Kimberly P. West and Emily R. Schulman, Assistant United States Attorneys, United States Attorney's Office, One Courthouse Way, Boston, Massachusetts, 02210, by first-class mail, postage prepaid, on this date.



Matthew D. Thompson